

Claim Objection

The Examiner has objected to the numbering of claims because two claims were erroneously numbered 18. In response, Applicants have amended to renumber one of the two claims as claim 37. Accordingly, Applicants request that the Examiner withdraw the objection to the claim.

Claim Rejections Under 35 U.S.C. 102

The Examiner has rejected claims 1-3, 8, 9, 11, 12, 20, 22, 23, 24, 28, 29 and 33 under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,506,393 to Ziarno ("Pat '393"). Applicants submit that based on the reasons set forth below, claims 1-3, 8, 9, 11, 12, 20, 22, 23, 24, 28, 29 and 33 are not anticipated by Pat '393.

Claim 1 of the present application recites:

1. A database in a computer system linked to a network and configured to store client data, the computer system having one or more processors, one or more storage devices coupled to the processor, the storage device having stored the database system, comprising:

one or more virtual data islands partitioned inside the database, each virtual data island storing client data for a specific client engaged in a fundraising campaign, the client data containing one or more constituent records (CR);
a data pool having selected data from the CRs; and
one or more program code for analyzing the data pool.

In section 2 of the Office Action, the Examiner stated:

Regarding claims 1, 22, 35 and 36, Pat '393 discloses: one or more virtual data islands [first donation kettle, second donation kettle 100, FIG. 1] partitioned inside the database [kettle data storage 302, FIG. 1a and terminal 120 data storage, FIG. 1]

Applicants respectfully disagree with the Examiner. Applicants submit that the donation kettle 100 of Pat '393 is not equivalent to the virtual data island recited in claim 1 of the present application. The virtual data islands 108A-108D illustrated in FIG. 1 of the present application are formed by partitioning a datawarehouse 104, each virtual data island storing client data of a particular nonprofit organization. The virtual data islands reside in the datawarehouse 104. This is described in the present application in page 8, lines 19-22:

the data warehouse 104 retains a plurality of nonprofit organizations' (NPOs) donor (or supporter) information in four virtual data islands 108A-108D. Each virtual data island 108 retains data of a particular organization. Each data island includes individual donor records.

The virtual data islands of the present application are further described in page 9, lines 4-6:

As illustrated in FIG. 1, individual NPO's virtual data islands and their records are virtually partitioned by an attribute called `proprietary_id` 112, which establishes the privacy boundaries in the record sets.

In contrast, the donation kettle 100 illustrated in FIG. 1 of Pat '393 is device that accepts and processes a credit card, debit card or cash donation. The donation kettle 100 does not reside inside a datawarehouse. This is described in col. 3, lines 47- 58 of Pat '393, wherein the donation kettle 100 is described as a device that accepts a cash donation, a credit card donation or a debit card donation. Thus, the donation kettle 100 of Pat '393 is not formed by partitioning a database and the donation kettle 100 does not partition the data of a plurality of client organizations. Also, in contrast to the virtual islands of the present application, the donation kettle 100 does not establish privacy boundaries between client organizations.

Applicants also respectfully disagree with the Examiner's statement that the donation kettles 100 of Pat '393 are partitioned inside the data storage 302. The donation

kettle 100, as described in Pat '393, is a donation processing device and does not reside inside the data storage 302. According to Pat '393, the donation kettle 100 temporarily stores information about a donation in the data storage 302 and at a later time communicates it to a computer terminal 120 (FIG. 1). This is stated in col. 3, line 66 - col. 4, line 5 of Pat '393:

the donation kettle 100 first stores the information about the contributor and/or the donation it has accepted in a data storage 302 (FIG. 1a), and then at a later time communicates it to terminal 120

The Examiner further stated in section 2 of the Office Action:

Pat '393 discloses:....each virtual data island storing client data for a specific client engaged in a fundraising campaign [col. 1, lines 20-25], the client data containing one or more constituent records [col. 3, lines 59-65]

Applicants respectfully disagree with the Examiner. Applicants submit that col. 1, lines 20-25 of Pat '393 does not disclose, teach or suggest virtual data islands that store client data for a specific client engaged fundraising campaign. Rather, col. 1, lines 20-25 of Pat '393 describes the donation kettle for processing a credit card donation, a debit card donation, or a cash donation. Furthermore, there is no teaching or suggestion of client data with one or more constituent records in col. 3, lines 59-65 of Pat '393. Rather, col. 3, lines 59-65 of Pat '393 essentially describe how the donation kettle communicates with a computer terminal:

A donation kettle 100 collects and provides information about a contributor and a donation. Using a communication link 140, preferably an RF (radio frequency) communication link, an infra-red or other free-propagating electromagnetic energy communication link, a donation kettle 100 communicates the information about a contributor to terminal 120 in one embodiment.

According to the Manual of Patent Examining Procedure (MPEP) Section 706.02, for anticipation under 35 USC 102, the reference must teach every aspect of the claimed invention. Since Pat '393 does not teach or suggest every element of claim 1, the invention recited in claim 1 is not anticipated by Pat '393. Accordingly, applicants believe that claim 1 is now allowable over Pat '393 and request that the Examiner withdraw his rejection and pass claim 1 to allowance.

Claims 2-21 depend from independent claim 1 and include all features and limitations of claim 1. Accordingly, Applicants submit that claims 2-21 are allowable over Pat '393 for the same reasons recited above.

Claims 22, 35, and 36 are independent claims that include the same features and limitations recited in claim 1. Applicants submit that claims 22, 35 and 36 are allowable over Pat '393 for at least the same reasons recited above.

Claim Rejections Under 35 USC 103

The Examiner has rejected dependent claims 4-7, 13-19, 25-27, 31, 32, 34 under 35 USC 103(a) as being obvious over Pat '393. These dependent claims include all the features and limitations of the independent claims 1 and 22.

According to the MPEP, to support a conclusion that the claimed invention is directed to obvious subject matter, the reference must expressly or impliedly suggest the claimed invention.....Ex parte Clapp, 227 USPQ 972. Based on the reasons set forth before, Pat '393 does not suggest or teach the invention claimed in independent claims 1 and 22. Thus, Applicants submit that the claims 4-7, 13-19, 25-27, 31, 32, 34, which depend from the independent claims, are not obvious in view of Pat '393. Accordingly, Applicants request that the Examiner withdraws the rejections under 35 USC 103 and pass the dependent claims 4-7, 13-19, 25-27, 31, 32, 34 to allowance.

Applicants believe that the Application is now in condition for allowance.
Accordingly, Applicants request that the Examiner pass the Application to allowance.
The Examiner is invited to call the undersigned attorney if a telephone call could help
resolve any remaining matters.

Respectfully submitted,



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VERSION WITH MARKINGS TO SHOW CHANGES MADE

[18] 37 (Amended). The database as recited in claim 1, wherein the client is a charitable organization.